Consultation Response

26 August 2013

Public Consultation on the new EU Occupational Safety and Health Policy Framework

Necessity and nature of a new EU OSH policy framework

Do you agree with the assessment of the EU OSH Strategy? Did it lead to tangible results?
While the strategy may have contributed in some areas, it's not clear if it was the dominant driver of change, or more probably had an incremental influence. Megatrends in the nature of work, major unemployment, and the expansion of the EU all had a considerable impact on the reported results.

In order to improve workplace safety and health, do you consider it necessary to continue coordinating policies at EU level or is action at national level sufficient?
EU leadership is essential, as is surveillance of the Member States' implementation of the strategy.

If you deem such a framework at EU level is necessary, explain why. Which aspects should be covered?
Increased mobility of EU workers or students makes the setting of harmonised minimum standards across the EU, to ensure adequate protection is provided regardless of location within Europe.

Level of commitment

With respect to your answer to the above questions, is there a need for a new EU OSH Strategy or should alternative measure be considered? Please explain.
A new EU strategy would be the simplest approach, provided a mechanism for tracking progress is actively enforced and routinely monitored.

If EU level action is necessary in order to improve workplace safety and health, do you consider it necessary to set broad goals and priorities and to coordinate national policies at EU level?
The EU should define broad goals and then monitor Member States progress towards achieving improvements. Regular feed-back to the Member States in a transparent way would allow benchmarking and encourage the slower countries to put more effort in to avoid being the "worst in class" next time around.

What would be the added-value of including specific targets into a possible new EU OSH policy framework to measure progress in improving workplace safety and health in the EU?
You cannot manage what you don't measure - setting targets selectively in areas of key concern only would be essential and facilitate tracking progress.

Should a new policy framework include a list of objectives, actions, calendars and actors involved in the implementation of actions or should it be limited to setting a vision for the future, and a definition of goals and priorities?
A short list of priority areas, say 10 or less, should be accompanied by a fully detailed roadmap for implementation. Other areas could adequately be managed by defining goals and priorities, provided an indicative timescale for execution accompanies them from the beginning.

Content of a new EU OSH policy framework

What are the key challenges in the OSH area? How would you prioritise them?
Increasing the visibility of the strategy and its goals to the workforce, not just the government agencies, and focusing on the SME's via the Chambers of Commerce and the trade association networks. Occupational diseases, which often develop with exposure over an extended period of time deserve more attention than previously.

What practical solutions do you suggest to address all or some of these challenges?
Employers' associations and trade unions should be targeted directly to encourage their involvement in making the workplace safer.

Do you consider that such a framework should develop initiatives to provide further protection for vulnerable groups of workers and/or for workers in specific high risk sectors?
Occupational diseases are specific to certain industries - emphysema for coalminers for example, or cancer for firefighters. Targeted campaigns would be of more benefit than a "one size fits all" approach. The development of harmonised statistics across the EU for the selected areas would be essential.

Do you consider that measures for the simplification of the existing body of EU OSH legislation should be included in such a political instrument? If so, which ones would you suggest?
Not necessarily. An accompanying guideline as to the OSH legislation would be helpful however.

Do you think that such a framework should specifically identify and address the challenges posed by the ageing of the working population? If so, which measures would you suggest?
Identifying and highlighting any significant challenges specifically driven by the ageing of the workforce would be useful, but addressing them is beyond the scope of this strategy.

What measures would you suggest to reduce the regulatory burden on SMEs and micro-enterprises, including reducing compliance costs and administrative burden, while ensuring a high level of compliance with OSH legislation by SMEs and micro-enterprises?*
SME's respond well to positive incentives, such as a "good place to work" recognition scheme awarded for completing and returning a check list of health & safety features of their workplace as presented to them in a simple questionnaire. If this could be linked to a reduction in their admin costs so much the better, as it will drive actions.

Do you have any views on the role of social dialogue at EU and national level to the identification, preparation and implementation of any new initiatives to improve health and safety at work?
The closer to the workforce the dialogue takes place the more visible the strategy would be to the employers and employees at the national level.

Add any further aspects that in your view were not sufficiently taken into account by the above questions?
Most people work in buildings (office blocks, factories, shopping malls, hotels etc.) where the greatest threat to their health would be in the event of fire breaking out. While the responsibility for the building's fire safety levels lies with its owner, the employer should be strongly encouraged to develop and implement a sound risk prevention policy and provide systematic staff training on the key steps to be taken by them should a fire ever occur in their building, including taking charge of organising others who may be in the building at the time as would notably be the case in shopping malls or hotels